

Lita Beth Wright (LW 0442)  
STORCH AMINI & MUNVES PC  
Two Grand Central Tower  
140 East 45<sup>th</sup> Street, 25<sup>th</sup> Floor  
New York, NY 10017  
(212) 490-4100  
Attorneys for Defendant Target Corporation

SCANNED

OF COUNSEL:

Kenneth A. Liebman (MN # 236731)  
James R. Steffen (MN # 204717)  
Matthew A. Stump (MN # 387623)  
FAEGRE & BENSON LLP  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402  
(612) 766-7000

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MITSUBISHI ELECTRIC CORPORATION,  
et al.,

Plaintiffs,

v.

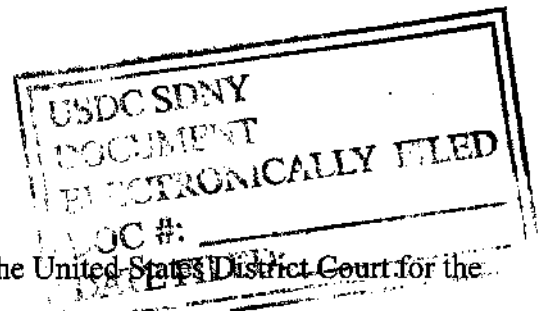
TARGET CORPORATION, et al.,

Defendants.

08 Civ. 03689 (SCR)

ECF CASE

**MOTION FOR AN ORDER FOR  
ADMISSION PRO HAC VICE**



Pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Court for the Southern District of New York, defendant Target Corporation ("Target"), by its undersigned attorneys, as and for its motion, respectfully represents:

1. By this motion and the accompanying Declaration of Lita Beth Wright, dated June 2, 2008, Target seeks an order permitting Matthew Stump to appear *pro hac vice* for the

purpose of representing Target as co-counsel in this action.

2. Mr. Stump is a member in good standing and entitled to practice law before the United States District Court for the District of Minnesota.

3. During the twelve (12) months immediately preceding the filing of this Motion, Mr. Stump did not seek, nor was he admitted *pro hac vice* in this Court.

4. Mr. Stump has never been disbarred, suspended or denied admission to practice.

5. Mr. Stump is familiar with the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the Southern District of New York, the Federal Rules of Evidence, and the New York State Lawyers' Code of Professional Responsibility, and understands that he shall be subject to the disciplinary jurisdiction of this Court.

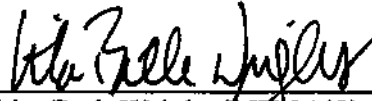
6. Co-counsel for Mr. Stump in this proceeding will be Lita Beth Wright of the law firm of Storch Amini & Munves PC who is formally admitted to the bar of the Court.

7. Mr. Stump understands that admission *pro hac vice* does not constitute formal admission to the bar of this Court.

WHEREFORE, defendant Target Corporation respectfully requests that this motion be granted in its entirety and for such other and further relief as is just and proper.

Dated: New York, New York  
June 2, 2008

STORCH AMINI & MUNVES P.C.



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Lita Beth Wright (LW) 0442)  
Two Grand Central Tower  
140 East 45th Street, 25 Floor  
New York, New York 10017  
Telephone (212) 490-4100  
Fax (212) 490-4208

**OF COUNSEL:**

Kenneth A. Liebman (MN Bar 236731)  
James R. Steffen (MN Bar 204717)  
Matthew A. Stump (MN Bar 387623)  
FAEGRE & BENSON LLP  
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90 South Seventh Street  
Minneapolis, Minnesota 55402  
Telephone (612) 766-7000  
Fax (612) 766-1600

**Attorneys for Defendant  
Target Corporation**

fb.us.2940496.01

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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MITSUBISHI ELECTRIC CORPORATION,  
et al.,

Plaintiffs,

v.

TARGET CORPORATION, et al.,

Defendants.

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)  
) 08 Civ. 03689 (SCR)  
)  
) ECF CASE  
)  
) **DECLARATION IN SUPPORT**  
) **OF MOTION FOR ADMISSION**  
) **PRO HAC VICE**  
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LITA BETH WRIGHT declares the following to be true under penalty of perjury  
pursuant to 28 U.S.C. § 1746:

1. I am an officer with the firm of Storch Amini & Munves PC and I am fully  
familiar with the facts set forth herein. My firm and the firm of Faegre & Benson LLP, 2200  
Wells Fargo Center, 90 South Seventh Street, Minneapolis, Minnesota 55402, are co-counsel for

defendant Target Corporation (“Target”) in this action. I respectfully submit this declaration in support of Target’s motion for an order admitting Matthew Stump, Esq. of Faegre & Benson LLP *pro hac vice* to represent Target as co-counsel in this action.

2. This action was commenced by service of plaintiffs’ summons and complaint upon Target on or about April 18, 2008.

3. Defendants respectfully move for the admission *pro hac vice*, of Matthew Stump, Esq. Mr. Stump is a member of the firm of Faegre & Benson LLP, co-counsel for Target. Mr. Stump is a member in good standing and entitled to practice law before The United States District Court for the District of Minnesota. Mr. Stump is familiar with Target’s claims and defenses relating to the subject matter in plaintiffs’ complaint. I believe that he will competently and professionally represent Target’s interests in this action.

4. Annexed as Exhibit A is the Certificate of Good Standing for Mr. Stump issued by The United States District Court for the District of Minnesota on May 23, 2008.

5. Annexed hereto as Exhibit B is a proposed Order admitting Matthew Stump, Esq. *pro hac vice* to appear before this court and in these proceedings on behalf of Target in all aspects of these proceedings.

6. I contacted counsel for plaintiffs to seek their consent on this motion. Plaintiffs’ counsel has no objection to the foregoing motion.

7. In light of the foregoing, I respectfully move for the admission *pro hac vice* of Matthew Stump, Esq. for purposes of defending this action on behalf of Target.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this  
2nd day of June 2008.

  
\_\_\_\_\_  
LITA BETH WRIGHT

fb.us.2940464.01

**UNITED STATES DISTRICT COURT**

**District of Minnesota**


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**CERTIFICATE OF  
GOOD STANDING**

I, Richard D. Sletten, Clerk of this Court, certify that  
Matthew A. Stump, Bar # 387623, was duly admitted  
to practice in this Court on October 5, 2007, and is in  
good standing as a member of the Bar of this Court.

Dated at Minneapolis, Minnesota, on May 23, 2008.

**RICHARD D. SLETTEN, CLERK**

  
\_\_\_\_\_  
(By) Deborah D. Bell, Deputy Clerk

Lita Beth Wright (LW 0442)  
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Attorneys for Defendant Target Corporation

OF COUNSEL:

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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MITSUBISHI ELECTRIC CORPORATION,	)	08 Civ. 03689 (SCR)	
et al.,	)		
	)	ECF CASE	
Plaintiffs,	)		
	)	<b>ORDER ADMITTING</b>	
v.	)	<b>MATTHEW STUMP</b>	
	)	<b><u>PRO HAC VICE</u></b>	
	)		
TARGET CORPORATION, et al.,	)		
	)		
Defendants.	)		
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Upon the motion of defendant Target Corporation, by its attorneys, Storch Amini & Munves PC, seeking an order for admission, pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Court for the Southern District of New York, and there being no opposition from plaintiff to the motion, and sufficient cause appearing, therefore, it is

ORDERED, that Matthew Stump, Esq. is hereby admitted *pro hac vice* to appear before



this Court and in these proceedings on behalf of defendant Target Corporation in all aspects of these proceedings. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: \_\_\_\_\_, 2008

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Honorable Stephen C. Robinson  
United States District Judge

fb.us.2940430.01

**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK     )  
  )ss.:  
COUNTY OF NEW YORK    )

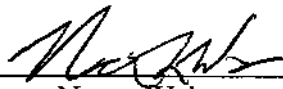
Noam Weissman, being duly sworn, deposes and says:

Deponent is not a party to the action, is over 18 years of age and resides in New York, NY.


On June 2, 2008, deponent served a true and correct copy of the within **MOTION FOR PRO HAC VICE ADMISSION OF MATTHEW STUMP** and supporting papers upon:

Garrard Russ Beeney  
Sullivan & Cromwell, LLP  
125 Broad Street  
New York, NY 10004

at the address designated by said attorneys for that purpose, by depositing a true and correct copy thereof, enclosed in postpaid wrappers addressed to the above in an official depository under the exclusive care and custody of the U.S. Postal Service within the State of New York.

  
\_\_\_\_\_  
Noam Weissman

Sworn to before me this  
2<sup>nd</sup> day of June, 2008.

  
\_\_\_\_\_  
Notary Public

JASON B. LEVIN  
Notary Public, State of New York  
No.02LE6139282  
Qualified in New York County  
Commission Expires on January 3, 2010